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**RECORD OF COMMUNICATION**

☒ PHONE CALL ☐ DIS ☐ ION ☐ FIELD TRIP ☐ CONFERENCE  
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:

Ken Perica, Monsanto  
 (314) 622-1400

FROM:

**Jim Fleer**

DATE

7-19-84

TIME

4:00

SUBJECT

Monsanto - Queeny Plant "Resource Recovery" Incinerator.

**SUMMARY OF COMMUNICATION**

Gave me background on incinerator issue. November 1983 meeting between Monsanto and Steve Busch and Dave Doyle. Presented idea of incinerator. Opinion at that time (without technical information) was that it sounded like legitimate recycle and informed them of 8000 BTU/lb. guideline. In January, Monsanto received a letter with an unclear response to the question of whether or not their incinerator would be regulated. They assumed from the letter that it would be exempt. In February 1984, MDNR requested that they receive a split sample of the CAC waste stream. Monsanto agreed. Monsanto recently took samples of this stream without MDNR present and provided results. Average BTU/lb. is about 7100. Proposed to separate out low BTU constituents so that this waste stream would be above 8000 therefore exempting the incinerator.

**CONCLUSIONS, ACTION TAKEN OR REQUIRED**

**INFORMATION COPIES**

TO:

LLH / File



R00105725

RCRA RECORDS CENTER

Nov '83

- Steve Busch
  - Dave Doyle
- } Said it was not sham, good idea.  
- 8000 guideline only

Jan / Feb - Response - not straight forward.

Feb / Mar - DNR - Request split sample.

Propose - improve character of waste stream  $\uparrow$  8000 BTU/lb.

Net Heating value  $\rightarrow$  combined waste streams or separate



Combined - however CAC blending is treatment  
 $\therefore$  regulated (tank)

- if you separate out low BTU part and remainder is above 8000 BTU then is beneficial and is not regulated.

March 18, 1984 FR



Mr. Kenneth M. Perica  
Senior Environmental Protection Engineer  
Monsanto Chemical Intermediate Company  
1700 South Second Street  
St. Louis, Missouri 66317

Dear Mr. Perica:

We have received your request for an eight and one-half week extension to submit your Resource Conservation and Recovery Act (RCRA) Part B application. We believe that an extension of that magnitude based on the reasons stated is unwarranted, however, a 30-day extension is granted. The new due date for submittal of your RCRA Part B application will be November 7, 1984.

① ~~We expect the incinerator at your site to be included in the Part B application. If you do not include this as part of your submittal, we expect the rationale for not including it to be submitted to this office by August 10, 1984. For this purpose, we have enclosed a list of the information required before the incinerator can be considered for legitimate resource recovery. If the information you provide is incomplete or inadequate, causing a decision on this matter to be delayed beyond November 7, 1984, you should be prepared for a letter of warning and possible enforcement action.~~

If you have any questions or comments regarding these matters, please contact James E. Fleece of my staff at (816) 374-6531.

Sincerely yours,

David A. Wagoner  
Director, Air and Waste Management Division

~~Enclosure~~  
cc: Scott Boyd, MDNR

ARWM/WMBR/PERM/Fleece/lm/x6531/7-24-84/Disk 5-34

PERM  
FLEECE

PERM  
HARRINGTON

WMBR  
MORBY

ARWM  
SPRATLIN

ARWM  
WAGONER

① In view of the recent tests on the BTU content of the waste streams to be burned in the incinerator and the failure of the CAC waste stream to be above 8000 BTU per pound (reported to MDNR to average 7100 BTU/lb), we expect the incinerator at your site to be included in Part B of the permit application. If you do not plan to include the incinerator in your submittal, you must notify this office of that decision by August 10, 1984.



Conditions Required for Incinerators Before  
Consideration as Legitimate Resource Recovery

1. Any bypass of the heat recovery process, through operator error or other means, is prevented when hazardous wastes are being burned.
2. A substantial percentage of the heat is recovered from the incinerator and beneficially reused.
3. The hazardous waste burned has a net heating value of 8000 BTU/pound or greater, and also meets other criteria established by EPA to determine that a bonafide reuse exists.

Technical information needed to determine if the incinerator can meet these conditions include:

1. Is the incinerator operated continuously? If not, please state the percentage of the time it is operating and discuss start-up and shutdown procedures, including the type of fuel used.
2. What is the primary fuel used to maintain proper operating temperatures of the incinerator?
3. What other types of fuel are used during the operation of the incinerator?
4. Characterization of wastes
  - a. Type of waste, physical form
    - i. gas
    - ii. liquid
    - iii. solid
    - iv. mixture
  - b. Percent of solids
  - c. Percent of chlorine and/or halogen content
  - d. Heating value (BTU/pound)
  - e. Metals content
  - f. Sulfur content
  - g. Ash content
  - h. Water content



5. Feed Rates

- a. Primary fuel: maximum, average, minimum
- b. Secondary fuels: maximum, average, minimum
- c. Wastes: maximum, average, minimum

6. What is the purpose of heat recovery?

7. What is the energy input size or rating of the heat recovery unit, i.e., BTH/hr.?

8. What is the energy recovered/output capacity or rating of the heat recovery unit, i.e., BTU/hr? A complete and thorough energy balance must be provided. In addition, what is the net cost or savings from using waste solvents as a fuel supplement?

9. During a representative week, what percent of fuel is derived from waste: maximum, average, minimum.

10. We need a copy of the process flow schematic including the heat recovery unit (a drawing, not a sketch).

11. What percent of the time is heat recovered when waste is burned?

12. What operating procedures are followed when the incinerator is recovering heat, i.e., is the waste burned only during the heat recovery process or is waste also burned at other times when heat is not being recovered?

13. Can or does a potential for bypassing the heat recovery unit exist?

14. What fuel efficiencies, temperatures and residence times are achieved by the boiler?

15. What types of emission controls and/or sampling, if any, are utilized?

16. List and describe the nonconventional "fuels" which you will handle at your facility. List the major sources by facility type of SIC. Quantities should also be estimated.

17. Method for storage (e.g., drums, above ground or underground tanks).

18. Methods for treatment to be utilized (e.g., dewatering, filtering, settling, etc.)?

19. Will blending take place?

20. Do you have an approved SPCC (spill prevention, control, counter measure) plan?



21. Type of emission monitoring (e.g., carbon monoxide, oxygen, etc.)?
22. Air pollution devices (e.g., scrubber, baghouse, etc.)?
23. Is the configuration of your system such that radiant energy is utilized?